STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
HEINZ AVE., SUITE 200
ELEY, CA 94710-2737

March 29, 1994

Commander
Western Division
Naval Facilities Engineering Command
Attn.: Mr. Gary Munekawa, Engineer in Charge
Code T4A2GM
900 Commodore Drive
San Bruno, California 94066-2402

Dear Mr. Munekawa:

REMOVAL ACTION, SITE 7A, FIELD INVESTIGATION WORK PLAN DRAFT, NAVAL AIR STATION, ALAMEDA

The California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) has reviewed the draft Field Investigation Work Plan for the Removal Action at Site 7A. The following are the comments of the Cal/EPA. These comments were prepare by James Nusrala of the RWQCB and are attached to this letter.

If you have questions regarding these comments, please contact me at (510) 540-3809. I will coordinate a response. If appropriate, a conference call may be arranged between relevant persons. You may contact James Nusrala, but should do so after contacting me to ensure a coordinated approach for all regulatory comments.

Sincerely,

Thomas P. Lanphar
Project Manager
Base Closure Branch

Enclosure

cc: See next page

1202

Mr. James Nusrala
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Lt. Mike Petouhoff
Base Environmental Coordinator
Alameda Naval Air Station
Building 1, Code 52
Alameda, California 94501

Mr. James Ricks Jr.
U.S. Environmental Protection Agency
H-92
75 Hawthorne St.
San Francisco, California 94105

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
San Francisco Bay Region

Internal Memo

To: Ron Gervason, DoD Section Leader

From:James Nusrala, Project Manager, (510) 286-0301

Date:March 16, 1994

Subject: Draft Field Investigation Work Plan, Site 7A Interim Removal Action, Building 459, Navy Exchange Fuel Station

General Comments:

1. There needs to be an additional monitoring well directly west of the Existing Underground Storage Tanks (UST's). Both Total Petroleum Hydrocarbons (TPH), and Benzene, Toluene, Xylene, and Ethylbenzene (BTEX) have been detected in the groundwater at well point W-2. Another well is needed to the west of point W-2 (in the assumed upgradient direction) to see how far the plume extends in this direction.

2. Please provide a map of the benzene soil gas survey, like Figure 8-3 in the Phases 2B and 3 in the Data Summary Report, October 27, 1992, in this work plan. Also, please provide some explanation of how the soil gas survey results contributed to the placement of additional wells and borings, depicted on Figure 3. If possible, please explain if the presence of storm sewer lines causes the peaks on the soil gas survey map, Figure 8-3.

Specific Comments:

1. Figure 3, Previous Sample Locations and Proposed IRA Field Investigation Sample Locations, An extra monitoring well is needed directly west of the four Existing UST's and the two Abandoned UST's. (Please see General Comment #1)

2. Section 2.2 Installation Restoration Program Investigation, page 5, last paragraph, The concentrations of TPH detected in the soil at Site 7A do not generally tend to decrease with depth. Table 8-5, Soil Analytical Results for Organic Compounds, Site 7A in the Phases 2B and 3 Data Summary Report, dated October 27, 1992, shows many soil borings where the concentration of TPH increases with depth. Please amend this paragraph to state that TPH in soil does not dissipate with depth, and that the clay does not in fact attenuate the downward migration of fuel hydrocarbons at this site.

3. Section 3.1 Sampling Objective and Approach, page 7, second paragraph, Please state that the monitoring wells will be installed to characterize the lateral extent of both

VOC's and TPH in the groundwater at Site 7A. It should be the purpose of these additional wells to investigate all contaminants detected initially at this site, i.e. both TPH and VOC's.

4. Section 3.2, Sample Locations and Collection, Step One, Please clarify in what direction the upgradient wells are located. This sentence is ambiguous.

5. Table 1, Site 7A Interim Removal Action Field Investigation, Sample Identification Numbers, The method for analyzing metals should be changed from the Contract Laboratory Procedure (CLP) to a method which would be more congruent with State and U.S. EPA's Maximum Contaminant Levels, and the Regional Water Quality Control Board's Basin Plan's Shallow Water Effluent Limits. Please reference the December 20, 1993 letter on this matter from the California Environmental Protection Agency, in this Table.

If you have any questions on the above letter, please contact me at (510) 286-0301.

Sincerely,

James Nusrala

James Nusrala
Project Manager